

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 1:23-CR-02071-MKD

Plaintiff,

Plea Agreement

v.

BRYAN CHRISTOPHER STEVENSON,

Defendant.

Plaintiff United States of America, by and through Vanessa R. Waldref,
United States Attorney the Eastern District of Washington, and Michael D.
Murphy, Assistant United States Attorney for the Eastern District of Washington,
and Defendant Bryan Christopher Stevenson ("Defendant"), both individually and
by and through Defendant's counsel, Jennifer Barnes, Esq., agree to the following
Plea Agreement.

1. Guilty Plea and Maximum Statutory Penalties

Defendant agrees to enter a plea of guilty to Counts 2, 4, 6, 8, 10, 12, 13, and
14 of the Indictment filed on December 12, 2023, which charge Defendant with
Online Enticement and Attempted Online Enticement, in violation of 18 U.S.C.
§ 2422(b), a Class B felony and Count 15 of the Indictment, which charges

1 Defendant with Possession of Child Pornography in violation of 18 U.S.C. §
2 2252A(a)(5)(B), (b)(2), a Class C Felony.

3 Defendant understands that the following potential penalties apply to Counts
4 2, 4, 6, 8, 10, 12, 13, and 14:

- 5 a. a term of imprisonment of not less than 10 years and up to a
6 lifetime;
- 7 b. a term of supervised release of not less than 5 years and up to a
8 lifetime;
- 9 c. a fine of up to \$250,000;
- 10 d. mandatory registration as a sex offender;
- 11 e. restitution; and
- 12 f. a \$100 special penalty assessment.

13 Defendant understands that the following potential penalties apply as to
14 Count 15:

- 15 a. a term of imprisonment of not more than 20 years;
- 16 b. a term of supervised release of not less than 5 years and up to a
17 lifetime;
- 18 c. a fine of up to \$250,000;
- 19 d. restitution;
- 20 e. mandatory registration as a sex offender;
- 21 f. a mandatory special assessment of \$5,000 pursuant to the
22 Justice for Victims of Trafficking Act ("JVTA") of 2015,
23 absent a judicial finding of indigence;
- 24 g. a mandatory special assessment of no more than \$17,000
25 pursuant to the Amy, Vicky and Andy Child Pornography
26 Victim Assistance Act of 2018; and
- 27 h. a \$100 special penalty assessment.

1 2. Supervised Release

2 Defendant understands that if Defendant violates any condition of
3 Defendant's supervised release, the Court may revoke Defendant's term of
4 supervised release, and require Defendant to serve in prison all or part of the term
5 of supervised release authorized by statute for the offense that resulted in such term
6 of supervised release without credit for time previously served on postrelease
7 supervision, up to the following terms:

- 8 a. 5 years in prison if the offense that resulted in the term of
9 Supervised Release is a class A felony,
10 b. 3 years in prison if the offense that resulted in the term of
11 Supervised Release is a class B felony, and/or
12 c. 2 years in prison if the offense that resulted in the term of
13 Supervised Release is a class C felony.

14 Accordingly, Defendant understands that if Defendant commits one or more
15 violations of supervised release, Defendant could serve a total term of
16 incarceration greater than the maximum sentence authorized by statute for
17 Defendant's offense or offenses of conviction.

18 3. The Court is Not a Party to this Plea Agreement

19 The Court is not a party to this Plea Agreement and may accept or reject it.
20 Defendant acknowledges that no promises of any type have been made to
21 Defendant with respect to the sentence the Court will impose in this matter.

22 Defendant understands the following:

- 23 a. sentencing is a matter solely within the discretion of the Court;
24 b. the Court is under no obligation to accept any recommendations
25 made by the United States or Defendant;
26 c. the Court will obtain an independent report and sentencing
27 recommendation from the United States Probation Office;
28

- d. the Court may exercise its discretion to impose any sentence it deems appropriate, up to the statutory maximum penalties;
- e. the Court is required to consider the applicable range set forth in the United States Sentencing Guidelines, but may depart upward or downward under certain circumstances; and
- f. the Court may reject recommendations made by the United States or Defendant, and that will not be a basis for Defendant to withdraw from this Plea Agreement or Defendant's guilty plea.

4. Potential Immigration Consequences of Guilty Plea

If Defendant is not a citizen of the United States, Defendant understands the following:

- a. pleading guilty in this case may have immigration consequences;
- b. a broad range of federal crimes may result in Defendant's removal from the United States, including the offense to which Defendant is pleading guilty;
- c. removal from the United States and other immigration consequences are the subject of separate proceedings; and
- d. no one, including Defendant's attorney or the Court, can predict with absolute certainty the effect of a federal conviction on Defendant's immigration status.

Defendant affirms that Defendant is knowingly, intelligently, and voluntarily pleading guilty as set forth in this Plea Agreement, regardless of any immigration consequences that Defendant's guilty plea may entail.

5. Waiver of Constitutional Rights

Defendant understands that by entering this guilty plea, Defendant is knowingly and voluntarily waiving certain constitutional rights, including the

1 following:

- 2 a. the right to a jury trial;
- 3 b. the right to see, hear and question the witnesses;
- 4 c. the right to remain silent at trial;
- 5 d. the right to testify at trial; and
- 6 e. the right to compel witnesses to testify.

7 While Defendant is waiving certain constitutional rights, Defendant
8 understands that Defendant retains the right to be assisted by an attorney through
9 the sentencing proceedings in this case and any direct appeal of Defendant's
10 conviction and sentence, and that an attorney will be appointed at no cost if
11 Defendant cannot afford to hire an attorney.

12 Defendant understands and agrees that any defense motions currently
13 pending before the Court are mooted by this Plea Agreement, and Defendant
14 expressly waives Defendant's right to bring any additional pretrial motions.

15 6. Rule 11 Nature of the Plea Agreement

16 Defendant acknowledges that this Plea Agreement is entered pursuant to
17 Federal Rule of Criminal Procedure 11(c)(1)(C) ("Rule 11(c)(1)(C)"). Pursuant to
18 Rule 11(c)(1)(C), the United States and Defendant agree that the appropriate
19 disposition of the case is a sentence of no less than 240 months (20 years) and no
20 greater than 360 months (30 years) in custody, to be followed by no less than ten
21 years and up to a lifetime of Supervised Release. The United States and Defendant
22 agree to make those sentencing recommendations to the Court. Although the
23 United States and Defendant agree to make these recommendations to the Court
24 pursuant to Rule 11(c)(1)(C), Defendant acknowledges that no promises of any
25 type have been made to Defendant with respect to the sentence the Court will
26 ultimately impose.

27 Defendant understands that Defendant may withdraw from this Plea
28 Agreement if the Court imposes a term of imprisonment of greater than 360

1 months (30 years) or indicates its intent to do so. Defendant also understands that
2 the United States may withdraw from this Plea Agreement if the Court imposes a
3 term of imprisonment of less than 240 months (20 years) or a term of supervised
4 release of less than ten years, or indicates its intent to do so.

5 The United States and Defendant acknowledge that the imposition of any
6 fine, restitution, or conditions of Supervised Release are not part of the Rule
7 11(c)(1)(C) nature of this Plea Agreement; that the United States and Defendant
8 are free to make any recommendations they deem appropriate as to the imposition
9 of fines, restitution, or conditions of Supervised Release; and that the Court will
10 exercise its discretion in this regard. The United States and Defendant
11 acknowledge that the Court's decisions regarding the imposition of fines,
12 restitution, or conditions of Supervised Release will not provide bases for
13 Defendant to withdraw Defendant's guilty plea or withdraw from this Rule
14 11(c)(1)(C) Plea Agreement.

15 Defendant acknowledges that if either the United States or Defendant
16 successfully withdraws from this Plea Agreement, the Plea Agreement becomes a
17 nullity, and the United States is no longer bound by any representations within it.

18 7. Admissibility of Facts and Prior Statements

19 By signing this Plea Agreement, Defendant admits the truth of the facts set
20 forth in the Factual Basis section of this Plea Agreement and agrees that these
21 facts, along with any written or oral statements Defendant makes in court, shall be
22 deemed usable and admissible against Defendant in any subsequent legal
23 proceeding, including criminal trials and/or sentencing hearings, under Federal
24 Rule of Evidence 801(d)(2)(A).

25 Defendant acknowledges, admits, and agrees that by signing this Plea
26 Agreement, Defendant is expressly modifying and waiving Defendant's rights
27 under Federal Rule of Criminal Procedure 11(f) and Federal Rule of Evidence 410

1 with regard to any facts Defendant admits and/or any statements Defendant makes
2 in court.

3 8. Elements of the Offense

4 The United States and Defendant agree that in order to convict Defendant of
5 Online Enticement and Attempted Online Enticement of a Minor, as charged in
6 Counts 2, 4, 6, 8, 10, 12, 13, and 14, in violation of 18 U.S.C. § 2422(b), the
7 United States would have to prove the following beyond a reasonable doubt.

- 8 a. *First*, on or about the dates specified in the Indictment as to
9 each count, within the Eastern District of Washington,
10 Defendant used a facility or means of interstate commerce,
11 namely, the Internet, to persuade, induce, entice, or coerce an
12 individual who had not attained the age of 18 years, to engage
13 in sexual activity;
- 14 b. *Second*, Defendant could have been charged with a criminal
15 offense for that sexual activity, namely, Production of Child
16 Pornography in violation of 18 U.S.C. 2251(a),(e); and
- 17 c. *Third*, Defendant believed that the individual he attempted to
18 persuade, induce, entice, or coerce was under the age of 18; and
- 19 d. *Fourth*, Defendant did something that was a substantial step
20 toward committing the crime that strongly corroborated his
21 intent to commit the crime. A “substantial step” is conduct that
22 strongly corroborated a defendant's intent to commit the crime.
23 To constitute a substantial step, a defendant's act or actions
24 must unequivocally demonstrate that the crime will take place
25 unless interrupted by independent circumstances. Mere
26 preparation is not a substantial step toward committing the
27 crime.
28

1 The United States and Defendant agree that in order to convict Defendant of
2 Possession of Child Pornography, as charged in Count 15, in violation of 18 U.S.C.
3 § 2252A(a)(4)(B), (b)(2), the United States would have to prove the following
4 beyond a reasonable doubt.

- 5 a. *First*, on or about August 30, 2022, within the Eastern District
6 of Washington, Defendant knowingly possessed any matter that
7 that the defendant knew contained visual depictions of minors
8 engaged in sexually explicit conduct;
9 b. *Second*, the defendant knew the visual depictions contained in
10 the matters showed minors engaged in sexually explicit
11 conduct;
12 c. *Third*, the defendant knew that production of such visual
13 depictions involved the use of minors in sexually explicit
14 conduct; and
15 d. *Fourth*, the visual depictions had been transported using any
16 means or facility of interstate commerce or produced using
17 materials that had been shipped or transported using any means
18 or facility of interstate commerce or had been shipped and
19 transported in and affecting interstate and foreign commerce by
20 any means including by computer.

21
22 9. Factual Basis and Statement of Facts

23 The United States and Defendant stipulate and agree to the following: the
24 facts set forth below are accurate; the United States could prove these facts beyond
25 a reasonable doubt at trial; and these facts constitute an adequate factual basis for
26 Defendant's guilty plea.

27 The United States and Defendant agree that this statement of facts does not
28 preclude either party from presenting and arguing, for sentencing purposes,

1 additional facts that are relevant to the Sentencing Guidelines computation or
2 sentencing.

3 Defendant is a resident of Yakima, Washington and knowingly undertook
4 the conversations with minor females described below while living in Yakima and
5 staying within the Eastern District of Washington.

6 On or about between July 5, 2021 and August 14, 2021, Defendant sent
7 payments over the internet to Minor 1, a child born in 2004, in return for nude
8 images and videos of her. In his Instagram account “youngbs5280”, law
9 enforcement agents found conversations with Minor 1 in which Defendant
10 requested Minor 1 perform different sexual acts on camera and offered to send her
11 money in return for performing those acts. In an interview conducted September 1,
12 2022, after being advised of his rights pursuant to Miranda, Defendant admitted to
13 receiving nude images from Minor 1, including videos of her masturbating in the
14 shower, and to conversing with Minor 1 via Instagram and Snapchat. Minor 1
15 confirmed to law enforcement that she communicated with a person using one of
16 the accounts identified as Defendant’s and sent nude images to that account in
17 exchange for money. Minor 1 stated that she provided her age to the person she
18 was communicating with. Law enforcement found nude images and videos of
19 Minor 1 masturbating in Defendant’s Gmail account and on his iPad as well as
20 screenshots of CashApp payments by Defendant to Minor 1.

21 On or about between April 6, 2022 and August 30, 2022, Defendant sent
22 payments to Minor 2, a child born in 2006, in return for nude images and videos of
23 nudity and sexual acts. Communications with Minor 2 were found by law
24 enforcement in Defendant’s email account “youngbs5281@gmail”. Defendant
25 admitted making payments to Minor 2 in exchange for nude images and videos of
26 sexual acts. Defendant requested Minor 2 send images or videos of her performing
27 different sexual acts and offered to pay her in exchange for those visual depictions.
28 At one point, Defendant sent a message in which he compliments Minor 2 as “such

1 a beautiful and sexy 15-year-old". Law enforcement found nude images of Minor
2 2 and videos of Minor 2 nude in the shower in Defendant's Gmail account and on
3 his iPad as well as screenshots of CashApp payments by Defendant to Minor 2.

4 On or about between about September 25, 2020 and August 30, 2022,
5 Defendant exchanged approximately 1,000 messages on Instagram with Minor 3, a
6 child born in 2007. At the beginning of the conversation, Defendant represented
7 that he was 16 years old. Minor 3 identified herself as 13 years old. Defendant
8 responded that she looked older and was "very sexy for [her] age". Defendant sent
9 Minor 3 an image of his penis and offered to trade nude images with Minor 3. He
10 also requested that she send him nude images or videos and offered to pay her for a
11 video of her having sex or masturbating. Minor 3 sent nude images to Defendant in
12 response to his requests.

13 On or between about September 13, 2020 and August 30, 2022, Defendant
14 exchanged thousands of messages over the internet with Minor 4, a child born in
15 2007. Defendant contacted Minor 4 using the name "Sean Hunter" and the
16 Instagram account "Sean_2580". He also contacted Minor 4 over the internet
17 using the names "Sara Garza", "Taylor Givens" and "Tay Tay Givens" and
18 utilizing profile pictures of a minor female for the associated social media
19 accounts. Law enforcement located two videos of Minor 4 nude and masturbating
20 on Defendant's iPad. In his communications with Minor 4, Defendant
21 complimented her and requested nude images from her. Defendant also encouraged
22 Minor 4 to have sex prior to going to church. Defendant contacted Minor 4 using
23 the persona "The One Guy" over Instagram and claimed to have videos of her
24 naked. Defendant threatened to send those videos to Minor 4's parents and
25 members of her church unless she provided him with additional videos. As "Sara
26 Garza", Defendant encouraged Minor 4 to accede to the requests from "The One
27 Guy" and to send him videos of herself masturbating. In his interview on
28 September 1, 2022 Defendant admitted to possessing nude images of Minor 4.

1 On or between about March 27, 2021 and August 30, 2022 Defendant
2 exchanged approximately 600 messages over Instagram with Minor 5, a child born
3 in 2007. Defendant complimented Minor 5 and asked if she was ok with “sex talk”
4 and offered “at least \$30” for a masturbation video “at least \$60” for a 5-10 minute
5 video of Minor 5 having sex. In 2022, Defendant sent a message to Minor 5
6 wishing her “Happy Birthday” and asking if she had any goals now that she was
7 15.

8 On or between about October 23, 2020 and December 10, 2021, Defendant
9 exchanged approximately 276 messages over the internet with Minor 6, a child
10 born in 2007. Defendant sent a first message to Minor 6 on October 23, 2020 in the
11 persona of another female child, “Kayla Miller”, over Instagram and told Minor 6
12 she was “gorgeous”. Over the course of the conversation, Defendant told Minor 6
13 he would love to see her nude photos. At one point, speaking as a minor female,
14 Defendant told Minor 6 he was thinking of selling nude images and asked for
15 advice, then asked if she would sell nudes for the price he claimed to be asking.
16 Defendant also sent Minor 6 information for one of his Instagram and one of his
17 Snapchat accounts and, in his female persona, represented that they were the
18 accounts of a male his female persona was selling nude images to and encouraged
19 Minor 6 to sell nudes to that person.

20 On or between about September 28, 2020 and October 10, 2020, Defendant
21 used the Instagram account “seah_h2510” to contact Minor 7, a child born in 2009
22 and purported to be a teenage male. In this persona, Defendant exchanged
23 approximately 200 messages with Minor 7. After Minor 7 told Defendant that she
24 was eleven years old, he requested to meet with her. He also encouraged her to
25 send him a video of her masturbating. Defendant also offered to exchange a video
26 of himself ejaculating in exchange for a video of Minor 7 masturbating with a
27 hairbrush.

1 On or between about May 28, 2020 and December 25, 2020, Defendant
2 exchanged approximately 2,164 messages with Minor 8, a child born in 2009 via
3 Instagram. Minor 8's Instagram page indicated that she anticipated graduating high
4 school in 2026. Defendant represented to Minor 8 that he was 16 years old and told
5 her he was attracted to her. He asked her to send him "sexy pictures" and told her
6 that sending nudes and images of sex or masturbation was not a bad thing. On
7 August 7, 2020, Defendant sent a message to Minor 8 saying "I really like you a
8 lot. But I have to be honest, I have a strong sex drive and I can't help but think
9 about you sexually. I really want you. I desperately want to see your naked body, it
10 actually hurts how bad I want to see it. But I also really like the rest of you, you are
11 sweet, funny, an amazing personality. You are my favorite person to talk to. But
12 the need to see you naked is very strong too. I had to get this off my chest. I love
13 you and I hope you understand."

14 Forensic extraction and review of Defendant's iPad and review of the
15 contents of his Google account revealed approximately 172 images and 45 videos
16 of minors engaging in sexually explicit conduct, including images of other pre-
17 pubescent minors, such as a video titled "April's first facial" in which an adult
18 male ejaculates on the face of a female child of approximately 4-6 years of age. In
19 his interview, Defendant admitted to having sexual interest in girls approximately
20 twelve years of age and to possessing images and videos of nude minor girls.
21 Defendant described uploading photos and videos of nude minor girls to the Mega
22 application from his Gmail account shortly before his Gmail account was shut
23 down and then re-uploading the images to a new Gmail account.

24 10. The United States' Agreements

25 The United States Attorney's Office for the Eastern District of Washington
26 agrees that at the time of sentencing, the United States will move to dismiss Counts
27 1, 3, 5, 7, 9 and 11 of the Indictment filed on December 12, 2023, which charge
28

1 Defendant with Production and Attempted Production of Child Pornography, in
2 violation of 18 U.S.C. § 2251(a), (e).

3 The United States Attorney's Office for the Eastern District of Washington
4 agrees not to bring additional charges against Defendant based on information in
5 its possession at the time of this Plea Agreement that arise from conduct that is
6 either charged in the Indictment or identified in discovery produced in this case,
7 unless Defendant breaches this Plea Agreement before sentencing.

8 11. United States Sentencing Guidelines Calculations

9 Defendant understands and acknowledges that the United States Sentencing
10 Guidelines ("U.S.S.G." or "Guidelines") apply and that the Court will determine
11 Defendant's advisory range at the time of sentencing, pursuant to the Guidelines.
12 The United States and Defendant agree to the following Guidelines calculations.

13 a. Base Offense Level

14 The United States and the Defendant agree that the base offense level for
15 Online Enticement is 28. U.S.S.G. § 2G1.3(a)(3). The United States and the
16 Defendant agree that the base offense level for Possession of Child Pornography is
17 18. U.S.S.G. § 2G2.2(a)(1).

18 b. Special Offense Characteristics

19 The United States and the Defendant do not have any agreement with
20 respect to special offense characteristics.

21 c. Acceptance of Responsibility

22 The United States will recommend that Defendant receive a downward
23 adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1(a), (b), if
24 Defendant does the following:

- 25 i. accepts this Plea Agreement;
- 26 ii. enters a guilty plea at the first Court hearing that takes
- 27 place after the United States offers this Plea Agreement;
- 28

- 1 iii. demonstrates recognition and affirmative acceptance of
- 2 Defendant's personal responsibility for Defendant's
- 3 criminal conduct;
- 4 iv. provides complete and accurate information during the
- 5 sentencing process; and
- 6 v. does not commit any obstructive conduct.

7 The United States and Defendant agree that at its option and on written
8 notice to Defendant, the United States may elect not to recommend a reduction for
9 acceptance of responsibility if, prior to the imposition of sentence, Defendant is
10 charged with, or convicted of, any criminal offense, or if Defendant tests positive
11 for any controlled substance.

12 d. Agreements Regarding Representations to the Court

13 The United States has a duty of candor to the tribunal. If the United States
14 and Defendant do not agree on the appropriate length of incarceration, the
15 appropriate length or applicable terms of supervised release, and/or the correct
16 guidelines calculations, variances, departures, and/or enhancements, the United
17 States reserves the right to respond to any and all arguments made by Defendant,
18 on any bases the United States deems appropriate, at all stages of this criminal
19 case.

20 Defendant may make any arguments it deems appropriate, at all stages of
21 this criminal case.

22 With regard to all briefing, submissions, and hearings in this criminal case,
23 the United States and Defendant agree to the following provisions:

- 24 i. The United States and Defendant may each respond to
- 25 any questions from the Court or United States Probation
- 26 Office;
- 27 ii. The United States and Defendant may each supplement
- 28 the facts under consideration by the Court by providing

1 information the United States or Defendant deems
2 relevant;

3 iii. The United States and Defendant may each present and
4 argue any additional facts that the United States or
5 Defendant believe are relevant to the Sentencing
6 Guidelines computation or sentencing;

7 iv. The United States and Defendant may each present and
8 argue information that may already be known to the
9 Court, including information contained in the
10 Presentence Investigation Report;

11 v. The United States and Defendant may each respond to
12 any arguments presented by the other;

13 vi. In order to support the United States' sentencing
14 recommendation as set forth herein, the United States
15 may oppose and argue against any defense argument or
16 any recommendation for any sentence lower than the
17 sentence recommended by the United States on any basis,
18 including arguments for a lower offense level, a lower
19 criminal history calculation, the application or non-
20 application of any sentencing enhancement or departure,
21 and/or any variance from the Guidelines range as
22 calculated by the Court;

23 vii. In order to support the defense sentencing
24 recommendation as set forth herein, Defendant may
25 oppose and argue against any argument by the United
26 States, or any recommendation for any sentence higher
27 than the sentence recommended by the defense on any
28 basis, including arguments for a higher offense level, a

1 higher criminal history calculation, the application or
2 non-application of any sentencing enhancement or
3 departure, and/or any variance from the Guidelines range
4 as calculated by the Court;

5 viii. The United States may make any sentencing arguments
6 the United States deems appropriate so long as they are
7 consistent with this Plea Agreement, including arguments
8 arising from Defendant's uncharged conduct, conduct set
9 forth in charges that will be dismissed pursuant to this
10 Plea Agreement, and Defendant's relevant conduct; and

11 ix. Defendant may make any sentencing arguments
12 consistent with this Plea Agreement Defendant deems
13 appropriate.

14 e. No Other Agreements

15 The United States and Defendant have no other agreements regarding the
16 Guidelines or the application of any Guidelines enhancements, departures, or
17 variances.

18 f. Criminal History

19 The United States and Defendant have no agreement and make no
20 representations about Defendant's criminal history category, which will be
21 determined by the Court after the United States Probation Office prepares and
22 discloses a Presentence Investigative Report.

23 12. Incarceration

24 At the time of Defendant's original sentencing in the District Court, the
25 United States agrees to make a sentencing recommendation to the Court that is
26 consistent with this Plea Agreement. The United States' agreement to make such a
27 recommendation is limited exclusively to the time of Defendant's original
28 sentencing in the District Court. The United States' agreement to make such a

1 recommendation does not prohibit or limit in any way the United States' ability to
2 argue for or against any future sentencing modification that takes place after
3 Defendant's original sentencing in the District Court, whether that modification
4 consists of an amendment to the Guidelines, a change to a statutory minimum or
5 maximum sentence, any form of compassionate release, any violation of
6 Supervised Release, or any other modification that is known or unknown to the
7 parties at the time of Defendant's original criminal sentencing. In this Plea
8 Agreement, the United States makes no promises or representations about what
9 positions the United States will take or recommendations the United States will
10 make in any proceeding that occurs after Defendant's original sentencing in the
11 District Court.

12 The United States and Defendant may each recommend any term of
13 incarceration of no less than 240 months (20 years) and no greater than 360 months
14 (30 years) imprisonment.

15 13. Supervised Release

16 The United States and Defendant each agree to recommend no less than 10
17 years of supervised release. Defendant agrees that the Court's decision regarding
18 the conditions of Defendant's Supervised Release is final and non-appealable; that
19 is, even if Defendant is unhappy with the conditions of Supervised Release ordered
20 by the Court, that will not be a basis for Defendant to withdraw Defendant's guilty
21 plea, withdraw from this Plea Agreement, or appeal Defendant's conviction,
22 sentence, or any term of Supervised Release.

23 The United States and Defendant agree to recommend that in addition to the
24 standard conditions of supervised release imposed in all cases in this District, the
25 Court should also impose the following conditions:

- 26 a. The United States Probation Officer may conduct, upon
27 reasonable suspicion, and with or without notice, a search of
28

1 Defendant's person, residences, offices, vehicles, belongings,
2 and areas under Defendant's exclusive or joint control.

3 b. Defendant shall participate and complete such drug testing and
4 drug treatment programs as the Probation Officer directs.

5 c. Defendant shall complete mental health evaluations and
6 treatment, including taking medications prescribed by the
7 treatment provider. Defendant shall allow reciprocal release of
8 information between the Probation Officer and the treatment
9 provider. Defendant shall contribute to the cost of treatment
10 according to the Defendant's ability.

11 d. Defendant shall report to the Probation Office any and all
12 electronic communications service accounts, as defined in 18
13 U.S.C. § 2510(15) used for user communications, dissemination
14 and/or storage of digital media files (i.e. audio, video, images).
15 This includes, but is not limited to, email accounts, social media
16 accounts, and cloud storage accounts. Defendant shall provide
17 each account identifier and password, and shall report the
18 creation of new accounts, changes in identifiers and/or
19 passwords, transfer, suspension and/or deletion of any account
20 within 5 days of such action. Failure to provide accurate
21 account information may be grounds for revocation. The
22 Probation Office is permitted to access and search any accounts
23 using Defendant's credentials pursuant to this condition only
24 when reasonable suspicion exists that Defendant has violated a
25 condition of his supervision and that the accounts to be
26 searched contain evidence of this violation.

1 14. Criminal Fine

2 The United States and Defendant do not recommend the imposition of a
3 criminal fine. Defendant acknowledges that the Court's decision regarding a fine
4 is final and non-appealable; that is, even if Defendant is unhappy with a fine
5 ordered by the Court, that will not be a basis for Defendant to withdraw
6 Defendant's guilty plea, withdraw from this Plea Agreement, or appeal
7 Defendant's conviction, sentence, or fine.

8 15. Judicial Forfeiture

9 Defendant agrees to voluntarily forfeit and relinquish to the United States all
10 right, title and interest in all assets listed herein, and hereby agrees to execute any
11 and all forms and pleadings necessary to effectuate such forfeiture of assets,
12 including, but not limited to the following:

- 13 - an Apple iPad, serial number DMRZ76RJMF3M.

14 Defendant stipulates that Defendant is the sole owner of the assets listed
15 above and that no one else has an interest in these assets.

16 Defendant acknowledges that the assets listed above, which Defendant is
17 agreeing to forfeit, are subject to forfeiture as property used or intended to be used
18 in any manner or part to commit or to facilitate the commission of the offenses to
19 which Defendant is pleading guilty.

20 Defendant agrees to take all steps requested by the United States to pass
21 clear title to these assets to the United States, and to testify truthfully in any
22 forfeiture proceeding.

23 Defendant agrees to hold harmless all law enforcement agents/officers, and
24 the United States, its agents, and its employees from any claims whatsoever arising
25 in connection with the seizure and/or forfeiture of the assets listed above.

26 Defendant waives further notice of any federal, state or local proceedings
27 involving the forfeiture of the seized assets that Defendant is agreeing to forfeit in
28 this Plea Agreement. Defendant waives all constitutional, equitable and statutory

1 challenges in any manner (including direct appeal, habeas corpus, or any other
2 means) to any forfeiture carried out in accordance with this Plea Agreement on any
3 grounds, including that the forfeiture constitutes an excessive fine or punishment.
4 Defendant knowingly and voluntarily waives Defendant's right to a jury trial on
5 the forfeiture of these assets. Defendant waives oral pronouncement of forfeiture
6 at the time of sentencing, and any defects that may pertain to forfeiture.

7 16. Mandatory Special Penalty Assessment

8 Defendant agrees to pay the \$900 mandatory special penalty assessment to
9 the Clerk of Court for the Eastern District of Washington, pursuant to 18 U.S.C.
10 § 3013.

11 17. Restitution

12 The United States and Defendant agree that restitution is required. 18
13 U.S.C. §§ 2259, 3663, 3663A, 3664. Defendant acknowledges that restitution is
14 mandatory, without regard to Defendant's economic situation, to identifiable
15 victims who suffer ongoing injury by virtue of child pornography images
16 depicting them circulating on the Internet indefinitely, in amounts that comport
17 with Defendant's relative role in the causal process that underlies the general
18 losses of the victims. *Paroline v. United States*, 572 U.S. 464 (2014); 18 U.S.C.
19 § 2259.

20 Pursuant to 18 U.S.C. § 3663(a)(3), in exchange for the United States
21 dismissing counts and/or agreeing not to bring additional charges, Defendant
22 voluntarily agrees to pay restitution to all victims of child pornography that
23 Defendant distributed, received, and/or possessed, as set forth in the discovery in
24 this case, whether or not Defendant pleads guilty to counts charging that specific
25 conduct, and whether or not such counts are foregone pursuant to this Plea
26 Agreement.

27 Defendant understands that for purposes of 18 U.S.C. § 2259, "victim"
28 means the individual harmed as a result of a commission of the crime, including,

1 in the case of a victim who is under 18 years of age, the legal guardian of the
2 victim. The United States and Defendant also hereby stipulate and agree that the
3 Court shall order full restitution, as appropriate, to any entity, organization,
4 insurance company, individual, and/or medical provider who provided medical
5 services and/or funds related to the treatment of any victim.

6 For any victim against whom Defendant's conduct occurred on or after
7 December 7, 2018, Defendant agrees that such victims shall be entitled to
8 restitution as if the AVAA applied to Defendant's conduct and agrees that the
9 Court should order restitution in an amount that reflects Defendant's relative
10 role in the causal process that underlies the victim's losses, but which is no less
11 than \$3,000 per victim.

12 Pursuant to 18 U.S.C. § 3663(a)(3), Defendant voluntarily agrees to pay
13 restitution for all losses caused by Defendant's individual conduct, in exchange for
14 the United States not bringing additional potential charges, regardless of whether
15 counts associated with such losses will be dismissed as part of this Plea
16 Agreement.

17 With respect to restitution, the United States and Defendant agree to the
18 following:

19 a. Restitution Amount and Interest

20 The United States and Defendant stipulate and agree that the Court should
21 order restitution in an amount to be determined at or before sentencing, and that
22 interest on this restitution amount, if any, should be waived.

23 b. Payments

24 To the extent restitution is ordered, the United States and Defendant agree
25 that the Court will set a restitution payment schedule based on Defendant's
26 financial circumstances. 18 U.S.C. § 3664(f)(2), (3)(A). Regardless, Defendant
27 agrees to pay not less than 10% of Defendant's net monthly income towards
28 restitution.

1 c. Treasury Offset Program and Collection

2 Defendant understands the Treasury Offset Program (“TOP”) collects
3 delinquent debts owed to federal agencies.

4 If applicable, the TOP may take part or all of Defendant’s federal tax refund,
5 federal retirement benefits, or other federal benefits and apply these monies to
6 Defendant’s restitution obligations. 26 U.S.C. § 6402(d); 31 U.S.C. § 3720A; 31
7 U.S.C. § 3716.

8 Defendant understands that the United States may, notwithstanding the
9 Court-imposed payment schedule, pursue other avenues to ensure the restitution
10 obligation is satisfied, including, but not limited to, garnishment of available funds,
11 wages, or assets. 18 U.S.C. §§ 3572, 3613, and 3664(m).

12 Nothing in this acknowledgment shall be construed to limit Defendant’s
13 ability to assert any specifically identified exemptions as provided by law, except
14 as set forth in this Plea Agreement.

15 Until Defendant’s fine and restitution obligations are paid in full, Defendant
16 agrees fully to disclose all assets in which Defendant has any interest or over
17 which Defendant exercises control, directly or indirectly, including those held by a
18 spouse, nominee or third party.

19 Until Defendant’s fine and restitution obligations are paid in full, Defendant
20 agrees to provide waivers, consents, or releases requested by the U.S. Attorney’s
21 Office to access records to verify the financial information.

22 d. Obligations, Authorizations, and Notifications

23 Defendant agrees to truthfully complete the Financial Disclosure Statement
24 that will be provided by the earlier of 30 days from Defendant’s signature on this
25 plea agreement or the date of Defendant’s entry of a guilty plea, sign it under
26 penalty of perjury, and provide it to both the United States Attorney’s Office and
27 the United States Probation Office. Defendant acknowledges and understands that
28 Defendant’s failure to timely and accurately complete and sign the Financial

1 Disclosure Statement, and any update thereto, may, in addition to any other penalty
2 or remedy, constitute Defendant's failure to accept responsibility under U.S.S.G
3 §3E1.1.

4 Defendant expressly authorizes the United States Attorney's Office to obtain
5 a credit report on Defendant upon the signing of this Plea Agreement. Until
6 Defendant's fine and restitution orders are paid in full, Defendant agrees to provide
7 waivers, consents or releases requested by the United States Attorney's Office to
8 access records to verify the financial information.

9 Defendant agrees to notify the Financial Litigation Unit of the United States
10 Attorney's Office before Defendant transfers any interest in property with a value
11 exceeding \$1,000 owned directly or indirectly, individually or jointly, by
12 Defendant, including any interest held or owned under any name, including trusts,
13 partnerships and corporations. Further, pursuant to 18 U.S.C. § 3664(k),
14 Defendant shall notify the court and the United States Attorney's Office within a
15 reasonable period of time, but no later than within 10 days, of any material change
16 in Defendant's economic circumstances that might affect defendant's ability to pay
17 restitution, including, but not limited to, new or changed employment, increases in
18 income, inheritances, monetary gifts or any other acquisition of assets or money.

19 Until Defendant's fine and restitution orders are paid in full, Defendant
20 agrees to disclose all assets in which Defendant has any interest or over which
21 Defendant exercises control, directly or indirectly, including those held by a
22 spouse, nominee or third party.

23 Pursuant to 18 U.S.C. § 3612(b)(F), Defendant understands and agrees that
24 until Defendant's fine and restitution orders are paid in full, Defendant must notify
25 the United States Attorney's Office of any change in the mailing address or
26 residence address within 30 days of the change.

27 18. Payments While Incarcerated
28

1 If Defendant lacks the financial resources to pay the monetary obligations
2 imposed by the Court, Defendant agrees to earn money toward these obligations by
3 participating in the Bureau of Prisons' Inmate Financial Responsibility Program.

4 19. Additional Violations of Law Can Void Plea Agreement

5 The United States and Defendant agree that the United States may, at its
6 option and upon written notice to the Defendant, withdraw from this Plea
7 Agreement or modify its sentencing recommendation if, prior to the imposition of
8 sentence, Defendant is charged with or convicted of any criminal offense or tests
9 positive for any controlled substance.

10 20. JVTA and AVAA Special Assessments

11 Defendant understands that Defendant will be required to pay a mandatory
12 special assessment of \$5,000 pursuant to the Justice for Victims of Trafficking Act
13 ("JVTA") of 2015, absent a judicial finding of indigence; and a mandatory special
14 assessment of no more than \$17,000, pursuant to the Amy, Vicky and Andy Child
15 Pornography Victim Assistance Act of 2018.

16 21. Sex Offender Registration

17 Defendant understands that by pleading guilty, Defendant will be required to
18 register as a sex offender upon release from prison as a condition of supervised
19 release, pursuant to 18 U.S.C. § 3583(d).

20 Defendant also understands that independent of Defendant's term of
21 supervised release, Defendant will be subject to federal and state sex offender
22 registration requirements, and that those requirements may apply throughout
23 Defendant's lifetime.

24 Defendant agrees that during the duration of Defendant's registration
25 requirement, Defendant will keep Defendant's registration current with the state
26 sex offender registration agency or agencies of any state in which Defendant lives
27 or resides for more than 72 hours.

1 Defendant agrees that during the duration of Defendant's registration
2 requirement, Defendant will notify and verify with the state sex offender
3 registration agency or agencies of any state in which Defendant lives or resides for
4 more than 72 hours, of changes to Defendant's name, place of residence, place of
5 employment, education, or religious worship, and any other information required
6 by such agency or agencies.

7 Defendant understands that Defendant will be subject to possible federal and
8 state penalties for failure to comply with any such requirements. Defendant
9 understands that under 18 U.S.C. § 4042(c), notice will be provided to certain law
10 enforcement agencies upon Defendant's release from confinement.

11 As a condition of Supervised Release, Defendant shall initially register with
12 the state sex offender registration of the state of Defendant's release, and shall also
13 register with the state sex offender agency in any state where defendant resides, is
14 employed, works, or is a student, as directed by the Probation Officer.

15 Defendant shall provide proof of registration to the Probation Officer within
16 72 hours of release.

17 22. Waiver of Appeal Rights

18 Defendant understands that Defendant has a limited right to appeal or
19 challenge Defendant's conviction and the sentence imposed by the Court.

20 In return for the concessions that the United States has made in this Plea
21 Agreement, Defendant expressly waives all of Defendant's rights to appeal any
22 aspect of Defendant's conviction and/or the sentence the Court imposes, on any
23 grounds.

24 In return for the concessions that the United States has made in this Plea
25 Agreement, Defendant expressly waives all of Defendant's rights to appeal any
26 aspect of Defendant's conviction and/or the sentence the Court imposes, on any
27 grounds, so long as the Court imposes a term of incarceration consistent with this
28 Rule 11(c)(1)(C) Plea Agreement. Defendant further expressly agrees that if the

1 Court indicates its intent to impose a sentence higher than the term or range
2 consistent with the Rule 11(c)(1)(C) terms of this Plea Agreement, Defendant has
3 fourteen (14) days from the sentencing hearing to file with the Court a notice of
4 withdrawal from the Rule 11(c)(1)(C) Plea Agreement. Defendant expressly
5 waives Defendant's right to withdraw from the Rule 11(c)(1)(C) Plea Agreement
6 more than fourteen (14) days after the Court either imposes a sentence higher than
7 the term or range consistent with the Rule 11(c)(1)(C) terms of this Plea
8 Agreement, or indicates its intent to do so.

9 23. Withdrawal or Vacatur of Defendant's Plea

10 Should Defendant successfully move to withdraw from this Plea Agreement
11 or should Defendant's conviction be set aside, vacated, reversed, or dismissed
12 under any circumstance, then:

- 13 a. Any obligations, commitments, or representations made by the
14 United States in this Plea Agreement shall become null and
15 void;
- 16 b. The United States may prosecute Defendant on all available
17 charges;
- 18 c. The United States may reinstate any counts that have been
19 dismissed, have been superseded by the filing of another
20 charging instrument, or were not charged because of this Plea
21 Agreement; and
- 22 d. The United States may file any new charges that would
23 otherwise be barred by this Plea Agreement.

24 The decision to pursue any or all of these options is solely in the discretion
25 of the United States Attorney's Office.

26 Defendant agrees to waive any objections, motions, and/or defenses
27 Defendant might have to the United States' decisions to seek, reinstate, or reinitiate
28

1 charges if a count of conviction is withdrawn, set aside, vacated, reversed, or
2 dismissed, including any claim alleging a violation of Double Jeopardy.

3 Defendant agrees not to raise any objections based on the passage of time,
4 including but not limited to alleged violations of any statutes of limitation or any
5 objections based on the Speedy Trial Act or the Speedy Trial Clause of the Sixth
6 Amendment.

7 24. Integration Clause

8 The United States and Defendant acknowledge that this document
9 constitutes the entire Plea Agreement between the United States and Defendant,
10 and no other promises, agreements, or conditions exist between the United States
11 and Defendant concerning the resolution of the case.

12 This Plea Agreement is binding only on the United States Attorney's Office
13 for the Eastern District of Washington, and cannot bind other federal, state, or local
14 authorities.

15 The United States and Defendant agree that this Agreement cannot be
16 modified except in a writing that is signed by the United States and Defendant.

17
18 Approvals and Signatures

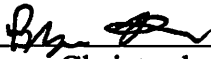
19 Agreed and submitted on behalf of the United States Attorney's Office for
20 the Eastern District of Washington.
21

22 Vanessa R. Waldref
23 United States Attorney

24  
25 Michael D. Murphy
26 Assistant United States Attorney


27 2/18/25
28 Date

1 I have read this Plea Agreement and I have carefully reviewed and discussed
2 every part of this Plea Agreement with my attorney. I understand the terms of this
3 Plea Agreement. I enter into this Plea Agreement knowingly, intelligently, and
4 voluntarily. I have consulted with my attorney about my rights, I understand those
5 rights, and I am satisfied with the representation of my attorney in this case. No
6 other promises or inducements have been made to me, other than those contained
7 in this Plea Agreement. No one has threatened or forced me in any way to enter
8 into this Plea Agreement. I agree to plead guilty because I am guilty.

9
10
11 
12 Bryan Christopher Stevenson
13 Defendant

2/12/25
Date

14 I have read the Plea Agreement and have discussed the contents of the
15 agreement with my client. The Plea Agreement accurately and completely sets
16 forth the entirety of the agreement between the parties. I concur in my client's
17 decision to plead guilty as set forth in the Plea Agreement. There is no legal
18 reason why the Court should not accept Defendant's guilty plea.

19
20
21  23664
22 Jennifer Barnes
23 Attorney for Defendant

2/12/2025
Date